

Message

From: Leon-Guerrero, Tim [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=440A5F3B4BD649D1839D54C32A777E2E-TLEONGUE]
Sent: 6/1/2021 4:51:37 PM
To: Chow, Alice [chow.alice@epa.gov]
Subject: RE: Invenergy Allegheny Energy Center (Draft) Modeling Comments

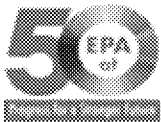
Thanks. Am restarting my computer so I should send those out within the next hour. Crossing my fingers I am able to restart without any issues (or this software push is done).

Tim LG

From: Chow, Alice <chow.alice@epa.gov>
Sent: Tuesday, June 01, 2021 12:49 PM
To: Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>
Subject: RE: Invenergy Allegheny Energy Center (Draft) Modeling Comments

It's fine

Alice H. Chow
Chief, Air Quality Analysis Branch (3AD40)
Air & Radiation Division (14-130)
USEPA, Region 3
Phone: 215-814-2144
Cell: 215-817-4380
Email: chow.alice@epa.gov



From: Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>
Sent: Tuesday, June 01, 2021 12:48 PM
To: Chow, Alice <chow.alice@epa.gov>
Subject: FW: Invenergy Allegheny Energy Center (Draft) Modeling Comments

Just checking if you were OK with my comments. I'd like to send this to them later this afternoon. Having some computer glitches because of a recent software push. Part of my screen is "whited" out. I can send something to Jason and Shaun letting them know to contact me directly if they have any issues with our comments. I think they will be dealing with a lot of outside comments including our own. As far as I know, Permits doesn't have any major issues with this permit.

Tim LG

From: Leon-Guerrero, Tim
Sent: Tuesday, June 01, 2021 7:36 AM
To: Chow, Alice <chow.alice@epa.gov>
Cc: Fry, Jessica <fry.jessica@epa.gov>
Subject: RE: Invenergy Allegheny Energy Center (Draft) Modeling Comments

I had a call with them the week before last to go over this (and I took out 2 pages of MERPs calculations) so there shouldn't be any surprises regarding my comments. The only one I'm really worried about is the aux boiler emission rate. They confirmed the difference and said they would lower the emission limit to match the modeling. I asked them if the source would be OK with that and they said they would have to be.

To be honest, most of my comments were made to allow them to acknowledge some points that I think will strengthen their application. I'm somewhat concerned they are going to get a lot of comments questioning why they are allowing another source to go in when the county is technically nonattainment for PM-2.5. On that front I'm hoping I've left a hanging curve ball in their strike zone that they can jump on. Whether they see it that way is another matter I guess.

So, I'd say these are suggestions. I'm hoping they acknowledge some of the points I tried to make in their comment response document. I'm assuming there will be a lot of comments both in support and against this project. Overall, I'd prefer to see plants like AEC come in so more ELRAMA and Cheswick sources become retired (see difference in NOx emission rates I laid out in Table 8).

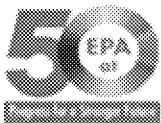
Thanks for the feedback. I'm hoping I'm being helpful but who knows.

Tim LG

From: Chow, Alice <chow.alice@epa.gov>
Sent: Tuesday, June 01, 2021 7:00 AM
To: Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>
Cc: Fry, Jessica <fry.jessica@epa.gov>
Subject: RE: Invenergy Allegheny Energy Center (Draft) Modeling Comments

Your comments are quite substantial, is ACHD required to address them or are they suggestions?

Alice H. Chow
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From: Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>
Sent: Tuesday, June 01, 2021 6:43 AM
To: Chow, Alice <chow.alice@epa.gov>
Cc: Fry, Jessica <fry.jessica@epa.gov>
Subject: Invenergy Allegheny Energy Center (Draft) Modeling Comments

Alice,

I attached my modeling comments to the new Invenergy Allegheny Energy Center (AEC); a combined cycle natural gas power plant to be built in Allegheny County. Comments are part of the PSD/NNSR package submitted to the Permit group.

Let me know if you have any comments, questions or corrections. Primary take aways, there is a slight slip up in the aux boiler emission rate that ACHD will have to address and a modeled 1-hr NO2 violation that AEC does not significantly contribute to but ACHD should still address (correct). I suspect will be a substantial number of public comments on this application.

When you are finished, I will make any corrections and forward to Permits. Thanks in advance.

Timothy A. Leon Guerrero
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